

Alphonso Nicholas Faggiolo,
713 Lamp Post Lane.
Aston, Pennsylvania 19014
610-818-7167
Plaintiff.

**DISTRICT COURT OF THE UNITED STATES
for the
Eastern District of Pennsylvania**

Case Number: 2:23-cv-04920

Alphonso Nicholas Faggiolo
Plaintiff,

vs.

BOROUGH OF RIDLEY PARK, et al.,
Defendants.

PLAINTIFF’S MOTION TO TAKE JUDICIAL NOTICE

Plaintiff submits this Rule 201 - Judicial Notice of the following Adjudicative Facts to the Honorable Joel Slomsky, Presiding Judge for Eastern District of Pennsylvania pertaining to Plaintiff’s complaint docketed with this Court on the 12th day of December 2023, pursuant to Title 42 U.S.C. § 1983, and in accordance with the Federal Rules of Civil Procedure Rule 3, Rule 8(a), (d)(1)(2), (e), Rule 9(c), Rule 10(a)(b)(c) and Rule 11(a)(b):

JUDICIAL NOTICE

Counterfeit Judicial Writs of Scire Facias

1. Plaintiff requests, pursuant to Federal Rule 201(a)(b)(c)(d) - Judicial Notice of Adjudicative Facts, that the court take judicial notice of the fact that on the 12th of March 2024, through a formal Pennsylvania Right to Know Record Request, Plaintiff acquired one hundred and sixty five (165) counterfeit **JUDICIAL** “writs of scire facias”, that third party debt collector Defendant Michelle Portnoff directed employees of Portnoff Law Associates to manufacture and execute in the name of the Commonwealth of Pennsylvania, purportedly for Defendant Borough of Ridley Park. **See Exhibit A**

*“Here, Michelle Portnoff actively participated in the tax collection process at every stage. She supervised, developed and approved the collection practices of the corporation. In addition, she had personal involvement with Taxpayers, i.e., mailing correspondence to them, and preparing and filing pleadings against them, thus, establishing that Michelle Portnoff engaged in misfeasance as a participating individual. Accordingly, the trial court did not err in finding Michelle Portnoff personally liable for her actions.” *Roethlein v. Portnoff Law Associates, Ltd.*, 25 A. 3d 1274 - Pa: Commonwealth Court 2011*

2. It’s a FACT that third party debt collector Defendant Michelle Portnoff and the employees of Portnoff Law Associates, have a custom, practice, and policy of **intentionally omitting the Pennsylvania Legislature’s provision requiring the signature of the President Judge of the Court**, pursuant to Pennsylvania Statutes Title 53 § 7185 (Form of scire facias); and the prothonotaries of the County of Delaware Court of Common Pleas act complicit by FAILING to secure the signature of the President Judge on purported **JUDICIAL writs of scire facias**; while also intentionally omitting the court’s seal, pursuant to Pennsylvania Statutes Title 53 § 7185 and Pennsylvania Statutes Title 42 § 2737(2). **See Exhibit B**

*In addition, the Statutory Construction Act disfavors surplusage. This Act requires that "every statute shall be construed, if possible, to give effect to all its provisions," 1 Pa. C.S.A. § 1921(a), and permits the presumption that the Legislature "intends the entire statute to be effective and certain." 1 Pa. C.S.A. § 1922(2). The Legislature is presumed to have intended to avoid mere surplusage in the words, sentences and provisions of its laws. Courts must therefore construe a statute, if possible, so as to give effect to every word. *Commonwealth v. Driscoll*, 485 Pa. 95, 401 A.2d 312 (1979); *Masland v. Bachman*, 473 Pa. 280, 291, 374 A.2d 517, 522 (1977); *Daly v. Hemphill*, 411 Pa. 263, 273, 191 A.2d 835, 842 (1963); *Pa. Ind. for Blind and Handicapped v. Larson*, 50 Pa. Commw. 95, 411 A.2d 1305 (1980).*

Pennsylvania Statutes Title 53 § 7185 - Form of scire facias

The claim shall be sued by writ of scire facias, and the form thereof shall be substantially as follows:

“Witness the Honorable, President Judge of our said court, this day of, A.D. 1

..... Prothonotary.”

Pennsylvania Statutes Title 42 § 2737(2) - Powers and duties of the office of the prothonotary

“Affix and attest the seal of the court or courts to all the process thereof and to the certifications and exemplifications of all documents and records pertaining to the office of the prothonotary and the business of the court or courts of which it is the prothonotary.”

3. It’s a FACT that third party debt collector Defendant Michelle Portnoff and the “administrative” prothonotaries of the County of Delaware Court of Common Pleas, such as Defendant Mary J. Walk, **without any JUDICIAL oversight, or the appearance of due process or the rule of law, are responsible for issuing and executing the attached**

counterfeit “JUDICIAL” writs of scire facias in the name of the Commonwealth of Pennsylvania, purportedly for the Borough of Ridley Park. For the sake of brevity, Plaintiff has only provided, as exhibits, 13 of the 165 records provided by Defendants Borough of Ridley Park and Michelle Portnoff. **See Exhibits C1-13.**

4. *It’s a FACT* that most, **if not all**, of the purported JUDICIAL writs of scire facias provided by Defendants Borough of Ridley Park and Michelle Portnoff, are unsupported with any court rendered judgments from a court of competent jurisdiction, are not signed by the President Judge of the court, and are not sealed by the prothonotaries of the Court, pursuant to Pennsylvania Statutes Title 53 § 7185 - Form of scire facias.

“The actual entry of an order or judgment is an act requiring judicial authority.” *Atlanta General Tires, Inc. vs. Williams*, 186 Ga App 677, 368 SE2d 333 (under statute); “Although a judge may seek assistance from a prevailing party in preparing the judgment, it remains emphatically the province and a responsibility of the judge to ascertain that the judgment is timely entered.” *Ward vs. Lupinacci* (App) 111 Idaho 40, 720 P2d 223. **“Thus, the clerk can only enter the judgment announced by the court.”** *Miller vs. Miller* (Okla) 664 P2d 1032 **“A judgment entered without previous judicial action by the court is void.”** *Miller vs. Miller* (Okla) 664 P2d 1032 (a recital in the clerk’s minutes that “the court renders judgment for the defendant’s per journal entry to be filed” **did not constitute a judgment where the trial court’s judgment did not appear in the record**). “The judicial authority reposed in the trial judge and the proper functioning of his office in rendering judgment **cannot be dependent upon the ministerial function of the court clerks in recording that fact.**” *Cirro Wrecking Co. v Roppolo*, 153 Ill 2d 6, 178 Ill Dec 750, 605 NE2d 544. “It also follows that because the **judicial authority is exercised exclusively by the trial judge** during the pendency of his office, that authority ends when the office is vacated.” *Cirro Wrecking Co. vs. Roppolo*, 153 Ill 2d 6, 178 Ill Dec 750, 605 NE2d 544.

JUDICIAL. Belonging to the office of a judge; as judicial authority. Black’s Law Dictionary 4th Edition.

WRIT. “A mandatory precept **issuing from court of justice.**” *Poirier v. East Coast Realty Co.*, 84 N.H. 461, 152 A. 612, 613. Process. **State ex rel. Walling v. Sullivan**, 245 Wis. 180, 13 N.W.2d 550, 555.

SCIRE FACIAS. Lat. In practice. **A judicial writ**, founded upon some matter of record, **such as a judgment or recognizance** and requiring the person against whom it is brought to show cause why the party bringing it should not have advantage of such record, or (in the case of a scire facias to repeal letters patent) why the record should not be annulled and vacated. 2 Archb.Pr. K.B. 86; Pub. St. Mass. p. 1295. The name is used to designate both the writ and the whole proceeding. *City of St. Louis v. Miller*, 235 Mo. App. 987, 145 S.W.2d 504, 505.


5. It's a FACT that the exhibits provided to this court in this Judicial Notice, are evidence that third party debt collector Defendant Michelle Portnoff and the “administrative” prothonotaries of the County of Delaware Court of Common Pleas, have taken, and are taking, money and property from people under the color of law, through the manufacturing and executing of COUNTERFEIT Judicial writs of scire facias, without any Judicial oversight or appearance of due process or the of law.

6. *It's a FACT* that third party debt collector Defendant Michelle Portnoff claims to represent over 200 municipalities, wherefore this custom, practice, and policy, of counterfeiting writs of scire facias to take money and property, without any Judge's signatures, without any Judicial oversight, and without any appearance of due process or rule of law, constitutes part of an enterprise, orchestrated by Defendant Portnoff, to illegally and unlawfully take money and property from people throughout Pennsylvania.

7. The specific goal of R.I.C.O. is to punish the use of an enterprise to engage in certain criminal activity. A person who uses an enterprise to engage in a pattern of racketeering activity may be convicted under the R.I.C.O. criminal statute Title 8 U.S.C. § 1963 (a) (Criminal penalties). An enterprise is defined as “any individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact, although not a legal entity.”

8. Extrapolating the monetary totals over the 200+ municipalities that third party debt collector Defendant Michelle Portnoff claims to represent, based on the 165 counterfeit writs of scire facias that have been obtained from Defendants Borough of Ridley Park and Michelle Portnoff, serves as a prima facie evidence that Defendant Portnoff has conservatively taken tens of millions of dollars from the People of Pennsylvania, by counterfeiting writs of scire facias and executing these documents by deception.

Submitted this 10th day of April 2024.

by 
Alphonso Nicholas Faggiolo
Plaintiff

Certificate of Service

I, Alphonso Nicholas Faggiolo, certify that on the 10th day of April, 2024, a true and correct copy of the above was electronically mailed to:

MICHAEL F. SCHLEIGH: mschleigh@hardinlawpc.net, amollai@hardinlawpc.net,
amoore@hardinlawpc.net

DONALD E. WIEAND, JR: dew@stevenslee.com, lak@stevenslee.com

KATHERINE H. MEEHAN: meehan@raffaelepuppio.com

NICOLE A. FEIGENBAUM: nicole.feigenbaum@pacourts.us, legaldepartment@pacourts.us

ERNEST S. ANGELOS: eangelos@raffaelepuppio.com, Altieri@raffaelepuppio.com

Exhibit A


AFFIDAVIT

I, Richard Tutak, being duly sworn according to law do hereby assert and aver:

1. I am the Ridley Park Borough Manager and Right-To-Know Officer.
2. The Borough is a small municipality and has limited administrative office staff.
3. On February 13, 2024, the Borough received a Right-to-Know Request from Pat Imperatore ("Requestor"), 654 Tupelo Lane, #6A Longs, South Carolina 29568, which was dated December 3, 2024 and requested various documents for a period of 8 years-January 2014 through December 2022: A true and correct copy of the request is attached hereto under Exhibit "A".
4. The initial request is dated December 3, 2023; however, the requestor was sending the request to an incorrect email address resulting in the significant delay of its receipt by me.
5. The Borough does not hold copies of the writs of scire facias sought by the Requester.
6. Therefore, in response to the request, and in order that the Requester might obtain the documents as expeditiously as possible, I obtained a list of case docket numbers from the Borough's delinquent tax collation law firm, Portnoff Law Associates, Ltd.
7. On February 14, 2024, I forwarded to the Requestor, via email, a list of One Hundred and Sixty-Five (165) docket numbers provided to me by Portnoff Law Associates, Ltd. and advised pursuant to 65 P.S. § 67.704 (b)(1), the requested writs of scire facias could be publicly obtained (using the provided docket numbers) from the Delaware County Court of Common Pleas' public records access website.
8. Regarding Requestor's second request seeking copies of the current agreement between Portnoff Law Associates, Ltd. and Ridley Park Borough, I mistakenly thought I had already provided the requested agreement. Upon further review, it was not provided.
9. On February 21, 2024, I received an email from the Requestor asking for .pdf copies of the writs of scire facias, despite the ability to publicly obtain such documents.
10. On March 1, 2024, I received notice of this Appeal docketed as OOR Dkt. AP 2024-0585.

Exhibit A

11. Following receipt of the notice of appeal, I obtained copies of all One Hundred and Sixty-Five (165) copies of the writs of scire facias from the Delaware County Court of Common Pleas website.
12. On March 11, 2024, I emailed the writs along with a copy of the current agreement between Portnoff Law Associates, Ltd. and the Borough of Ridley Park, to Requester at both of her email addresses.
13. After initially receiving bounce back messages from both of the Requester's email addresses, the emails finally went through on March 11, 2024.
14. On March 12, 2024, I emailed the Requester asking for confirmation that she received the emails. She responded that she had, which I understood to mean she had received the documents. See attached Exhibit "B."


Richard Tutak

Sworn to and subscribed before me this
26th day of March, 2024


Notary Public

Commonwealth of Pennsylvania - Notary Seal
Christine Marie Willert, Notary Public
Delaware County
My commission expires September 12, 2025
Commission number 1320265
Member, Pennsylvania Association of Notaries

Exhibit B

53 Pa. Stat. § 7185

Section 7185 - Form of scire facias; addition of parties; amicable scire facias

The claim shall be sued by writ of scire facias, and the form thereof shall be substantially as follows:

The Commonwealth of Pennsylvania to (names of the parties defendant), Greeting:

Whereas, The (city, borough, or other municipality, as the case may be,) on the day of, A.D. 1, filed its claim in our court of common pleas of County; at No., Term, 1, M.L.D., for the sum of \$....., with interest from the day of, 1, for (give the improvement, or that for which the claim is filed), against the following property situate in (give location and brief description of the property), owned or reputed to be owned by you.

And whereas, We have been given to understand that said claim is still due and unpaid, and remains a lien against the said property;

Now, you are hereby notified to file your affidavit of defense to said claim, if defense you have thereto, in the office of the prothonotary of our said court, within fifteen days after the service of this writ upon you. If no affidavit of defense be filed within said time, judgment may be entered against you for the whole claim, and the property described in the claim be sold to recover the amount thereof.

Witness the Honorable, President Judge of our said court, this day of, A.D. 1

..... Prothonotary.

(Seal)

The claimant, when he files his praecipe for the writ of scire facias, may direct the prothonotary to add and insert the names of any persons whom the claimant may know to have an interest in the premises, and the scire facias shall be issued containing such additional names. But the parties to the claim may agree upon an amicable scire facias, upon such terms as may be agreed upon, with the same effect as if a scire facias, in the form aforesaid, had been duly issued, served, and returned; or the defendants, or any of them, may waive the issue of a scire facias, and appear with like effect as if the scire facias had been issued and served.

53 P.S. § 7185

1923, May 16, P.L. 207, § 17.

Exhibit C1

20-47983-0/20-48061-0/21-52028-0/21-52081-0/RP6/_JS
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: ROBERT P. DADAY, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 43006

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
vs.	:	DELAWARE COUNTY, PA
The Heirs of Margaret J. Faggiolo, and Unknown Heirs,	:	
Successors or Assigns of Margaret J. Faggiolo,	:	NO. CV-2021-062985
Deceased, and All Persons, Firms or Associations	:	
Claiming Right, Title or Interest From or Under	:	IN REM
Margaret J. Faggiolo, Deceased, Owner, Reputed	:	
Owner or Whoever May Be the Owner by operation of	:	
law	:	
Defendant(s)	:	

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to:	The Heirs of Margaret J. Faggiolo, and Unknown Heirs, Successors or Assigns of Margaret J. Faggiolo, Deceased, and All Persons, Firms or Associations Claiming Right, Title or Interest From or Under Margaret J. Faggiolo, Deceased, Owner, Reputed Owner or Whoever May Be the Owner by operation of law
--------------------------------------	--

GREETINGS:

WHEREAS, Borough of Ridley Park, on July 27, 2021, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2021-062985, for the sum of \$3,744.98* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 505 Johnson Avenue, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-01192-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)

COSTS

CJS \$17.50
 JUDGE FEE \$41.00
 SAT \$10.00


 OFFICE OF JUDICIAL SUPPORT

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

ISSUED

08-25-2022 04:30 PM
 OFFICE OF JUDICIAL SUPPORT
 DELAWARE COUNTY, PA

Exhibit C2

20-47984-0/21-52029-0/RP6/_JS
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: ROBERT P. DADAY, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 43006

Borough of Ridley Park
 Plaintiff

vs.

The Heirs of Margaret J. Faggiolo, and Unknown Heirs,
 Successors or Assigns of Margaret J. Faggiolo, Deceased,
 and All Persons, Firms or Associations Claiming Right,
 Title or Interest From or Under Margaret J. Faggiolo,
 Deceased, Owner, Reputed Owner or Whoever May Be
 the Owner by operation of law

Defendant(s)

: IN THE COURT OF COMMON PLEAS
 : DELAWARE COUNTY, PA
 : NO. CV-2021-062986
 : IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of
 Pennsylvania to:

The Heirs of Margaret J. Faggiolo, and Unknown Heirs, Successors or Assigns
 of Margaret J. Faggiolo, Deceased, and All Persons, Firms or Associations
 Claiming Right, Title or Interest From or Under Margaret J. Faggiolo, Deceased,
 Owner, Reputed Owner or Whoever May Be the Owner by operation of law

GREETINGS:

WHEREAS, Borough of Ridley Park, on July 27, 2021, filed its claim in the Court of
 Common Pleas of Delaware County; Docket No. CV-2021-062986, for the sum of \$117.69* for real
 estate taxes and real estate taxes due Borough of Ridley Park, said Claim filed against property
 owned by you in Borough of Ridley Park located at Kane Avenue, Ridley Park, Pennsylvania, as
 more particularly described in said Claim, and said property being further described as Folio Number
 37-00-01210-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid,
 and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you
 have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the
 service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be
 entered against you for the whole Claim, and the property described in the Claim will be sold to
 recover the amount thereof.

(SEAL)

COSTS

CJS \$17.50
 JUDGE FEE \$41.00
 SAT. \$10.00

Mary J. Webb
 OFFICE OF JUDICIAL SUPPORT

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It
 does not include any costs or attorney fees added, interest accrued, or credits for payments applied
 after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C3

20-47985-0/20-48060-0/21-52030-0/21-52082-0/RP6/_JS
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: ROBERT P. DADAY, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 43006

Borough of Ridley Park
 Plaintiff

vs.

The Heirs of Margaret J. Faggiolo, and Unknown
 Heirs, Successors or Assigns of Margaret J.
 Faggiolo, Deceased, and All Persons, Firms or
 Associations Claiming Right, Title or Interest
 From or Under Margaret J. Faggiolo, Deceased,
 Owner, Reputed Owner or Whoever May Be the
 Owner by operation of law
 Defendant(s)

: IN THE COURT OF COMMON PLEAS
 : DELAWARE COUNTY, PA
 : NO. CV-2021-062988
 : IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of
 Pennsylvania to:

The Heirs of Margaret J. Faggiolo, and Unknown Heirs, Successors or Assigns
 of Margaret J. Faggiolo, Deceased, and All Persons, Firms or Associations
 Claiming Right, Title or Interest From or Under Margaret J. Faggiolo, Deceased,
 Owner, Reputed Owner or Whoever May Be the Owner by operation of law

GREETINGS:

WHEREAS, Borough of Ridley Park, on July 27, 2021, filed its claim in the Court of
 Common Pleas of Delaware County; Docket No. CV-2021-062988, for the sum of \$3,381.40* for
 real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against
 property owned by you in Borough of Ridley Park located at 215 Kane Avenue, Ridley Park,
 Pennsylvania 19078, as more particularly described in said Claim, and said property being further
 described as Folio Number 37-00-01211-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid,
 and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you
 have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the
 service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be
 entered against you for the whole Claim, and the property described in the Claim will be sold to
 recover the amount thereof.

(SEAL)

COSTS

CJS \$ 17.50

JUDG. FEE \$ 41.00

SAT. \$ 10.00

Mary J. White
 OFFICE OF JUDICIAL SUPPORT

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It
 does not include any costs or attorney fees added, interest accrued, or credits for payments applied
 after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C4

22-46481-0/22-46558-0/RP6/JB
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: RUSSELL E. BRYANT, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 328139

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Catherine E. Mirra	:	DELAWARE COUNTY, PA
Defendant(s)	:	NO. CV-2023-062181
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Catherine E. Mirra
 GREETINGS:

WHEREAS, Borough of Ridley Park, on June 22, 2023, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2023-062181, for the sum of \$1,383.51* for real estate taxes and sewer fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 33 Chester Pike, Ridley Park, Pennsylvania, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-02056-45, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)

COSTS

OJS \$ ~~17.50~~ 17.50
JUDG. FEE \$23.50
SAT. \$10.00

Mary J. White
 OFFICE OF JUDICIAL SUPPORT
Maria Placido

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C5

21-52001-0/21-52060-0/RP6/CMP
PORTNOFF LAW ASSOCIATES, LTD.
BY: DAVID D. DUGAN, ESQUIRE
P.O. BOX 391
NORRISTOWN, PA 19404
(866) 211-9466

ATTORNEY FOR PLAINTIFF
ATTORNEY ID 312395

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	DELAWARE COUNTY, PA
Sokhen Pin	:	
Ponny Pin	:	NO. CV-2021-064223
Defendant(s)	:	
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Sokhen Pin and Ponny Pin

GREETINGS:

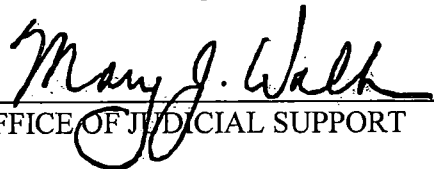
WHEREAS, Borough of Ridley Park, on September 24, 2021, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2021-064223, for the sum of \$2,391.58* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 409 N. Swarthmore Avenue, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-02252-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)

10-29-2021


OFFICE OF JUDICIAL SUPPORT

COSTS

OJS \$ 17.50

JUDG. FEE \$ 23.50

SAT. \$ 10.00

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim.

Exhibit C6

21-52041-0/21-52093-0/RP6/KLO
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: JASON J. LEININGER, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Joseph Richard Mosco	:	DELAWARE COUNTY, PA
MaryAnn Mosco	:	
Defendant(s)	:	NO. CV-2021-065091
	:	IN REM

WRIT OF SCIRE FACIAS

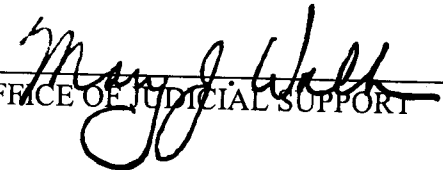
The Commonwealth of Pennsylvania to: Joseph Richard Mosco and MaryAnn Mosco
 GREETINGS:

WHEREAS, Borough of Ridley Park, on November 12, 2021, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2021-065091, for the sum of \$2,193.66* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 54 Hetzel Road, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-00902-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


 OFFICE OF JUDICIAL SUPPORT

COSTS

OJS \$ 17.50
 JUDG. FEE \$ 23.50
 SAT. \$ 10.00

01-28-22

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C7

22-46459-0/22-46539-0/RP6/KLO
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: JASON J. LEININGER, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Barbara G. Cocci	:	DELAWARE COUNTY, PA
Defendant(s)	:	NO. CV-2022-064167
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Barbara G. Cocci
 GREETINGS:

WHEREAS, Borough of Ridley Park, on August 16, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-064167, for the sum of \$2,660.08* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 32 W. Ward Street, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-02453-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


 OFFICE OF JUDICIAL SUPPORT

COSTS
 OJS \$ 17.50
 JUDG. FEE \$ 41.00
 SAT. \$ 10.00

9/6/22

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C8

22-46476-0/22-46554-0/RP6/KLO
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: JASON J. LEININGER, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Joseph McDevitt	:	DELAWARE COUNTY, PA
Kimberly McDevitt	:	
Defendant(s)	:	NO. CV-2022-064169
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Joseph McDevitt and Kimberly McDevitt

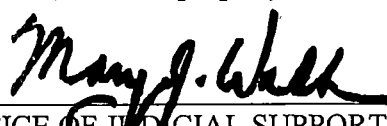
GREETINGS:

WHEREAS, Borough of Ridley Park, on August 16, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-064169, for the sum of \$2,308.84* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 13 Jackson Avenue, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-01154-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


 OFFICE OF JUDICIAL SUPPORT

COSTS

OJS \$ 17.50
 JUDG. FEE \$ 44.00
 SAT. \$ 10.00

9/6/22

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C9

22-46503-0/22-46576-0/RP6/KLO
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: JASON J. LEININGER, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
John T. Wilson	vs.	DELAWARE COUNTY, PA
Defendant(s)	:	NO. CV-2022-064232
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: John T. Wilson

GREETINGS:

WHEREAS, Borough of Ridley Park, on August 19, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-064232, for the sum of \$2,451.30* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 414 Tome Street, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-02381-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


 OFFICE OF JUDICIAL SUPPORT

COSTS

OJS \$ 17.50

JUDG. FEE \$ 41.00

SAT. \$ 10.00

9/16/22

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C10

22-46475-0/22-46553-0/RP6/KLO
PORTNOFF LAW ASSOCIATES, LTD.
BY: JASON J. LEININGER, ESQUIRE
P.O. BOX 391
NORRISTOWN, PA 19404
(866) 211-9466

ATTORNEY FOR PLAINTIFF
ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Mark Killion	:	DELAWARE COUNTY, PA
Sharon Killion	:	NO. CV-2022-064307
Defendant(s)	:	
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Mark Killion and Sharon Killion
GREETINGS:

WHEREAS, Borough of Ridley Park, on August 25, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-064307, for the sum of \$2,667.62* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 325 Nicholson Road, Ridley Park, Pennsylvania, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-01433-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


OFFICE OF JUDICIAL SUPPORT

COSTS

OJS \$17.50
JUDG. FEE \$41.00
SAT. \$10.00

9/29/22

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C11

22-46498-0/22-46574-0/RP6/JB
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: JASON J. LEININGER, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 87525

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Christa J. Thompson	:	DELAWARE COUNTY, PA
Defendant(s)	:	
	:	NO. CV-2022-065115
	:	IN REM

WRIT OF SCIRE FACIAS

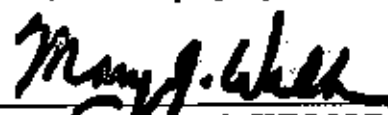

The Commonwealth of Pennsylvania to: Christa J. Thompson
 GREETINGS:

WHEREAS, Borough of Ridley Park, on September 29, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-065115, for the sum of \$2,137.28* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 110 W. Ridley Avenue, Ridley Park, Pennsylvania, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-01661-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)


 OFFICE OF JUDICIAL SUPPORT


COSTS

OJS \$17.50

JUDG. FEE ~~\$23.50~~ 23.50

SAT. \$ 10.00

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C12

22-46458-0/22-46538-0/RP6/KLO
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: RUSSELL E. BRYANT, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 328139

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Kelly Claypoole	:	DELAWARE COUNTY, PA
Defendant(s)	:	NO. CV-2022-066487
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Kelly Claypoole
 GREETINGS:

WHEREAS, Borough of Ridley Park, on October 26, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-066487, for the sum of \$1,543.05* for real estate taxes and sewer fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 33 Chester Pike, Ridley Park, Pennsylvania 19078, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-02056-50, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL) 11-15-2022

Mary J. Walsh
 OFFICE OF JUDICIAL SUPPORT
B. Chaffel

COSTS

OJS \$ 17.50

JUDG. FEE \$ 23.50

SAT. \$ 10.00

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

Exhibit C13

22-46433-0/22-46519-0/RP6/JB
 PORTNOFF LAW ASSOCIATES, LTD.
 BY: RUSSELL E. BRYANT, ESQUIRE
 P.O. BOX 391
 NORRISTOWN, PA 19404
 (866) 211-9466

ATTORNEY FOR PLAINTIFF
 ATTORNEY ID 328139

Borough of Ridley Park	:	IN THE COURT OF COMMON PLEAS
Plaintiff	:	
	vs.	
Dawn R. Vitale	:	DELAWARE COUNTY, PA
Defendant(s)	:	NO. CV-2022-067954
	:	IN REM

WRIT OF SCIRE FACIAS

The Commonwealth of Pennsylvania to: Dawn R. Vitale

GREETINGS:

WHEREAS, Borough of Ridley Park, on December 7, 2022, filed its claim in the Court of Common Pleas of Delaware County; Docket No. CV-2022-067954, for the sum of \$2,282.21* for real estate taxes and sewer and trash fees due Borough of Ridley Park, said Claim filed against property owned by you in Borough of Ridley Park located at 422 Bartlett Avenue, Ridley Park, Pennsylvania, as more particularly described in said Claim, and said property being further described as Folio Number 37-00-00052-00, owned or reputed to be owned by you;

AND WHEREAS, we have been given to understand that said Claim is still due and unpaid, and remains a lien against the said property;

NOW, you are hereby notified to file your Affidavit of Defense to said Claim, if defense you have thereto, in the Office of Judicial Support of our said Court, within fifteen (15) days after the service of this Writ upon you. If no Affidavit of Defense is filed within said time, Judgment may be entered against you for the whole Claim, and the property described in the Claim will be sold to recover the amount thereof.

(SEAL)

Mary J. Walsh
 OFFICE OF JUDICIAL SUPPORT
Alma Madison

COSTS

OJS \$ 11.50

JUDG. FEE \$ 23.50

SAT. \$ 10.00

* The amount set forth above reflects the balance due as of the date of the filing of the Claim. It does not include any costs or attorney fees added, interest accrued, or credits for payments applied after the date of the filing of the Claim. Additionally, interest accrues on a daily basis.

ISSUED

04-25-2023 09:59 AM
 OFFICE OF JUDICIAL SUPPORT
 DELAWARE COUNTY, PA